

51709

# SPENCER FANE BRITT & BROWNE

JAMES T. BRITT  
WILLIAM H. WOODSON \*\*  
ROBERT P. LYONS  
RICHARD H. SPENCER  
DONALD W. GIFFIN \*\*  
LOWELL L. SMITHSON  
JAMES R. WILLARD  
GAD SMITH \*\*  
EDWARD A. SETZLER  
RICHARD W. SCARRITT  
JACK L. WHITACRE  
BASIL W. KELSEY \*\*  
JEROME T. WOLF \*\*  
MENDEL SMALL  
JAMES G. BAKER  
JACOB F. MAY, JR. \*\*  
CARL H. HELMSTETTER  
E. J. HOLLAND, JR.  
JAMES W. KAPP, JR.  
FRANK B. W. MCCOLLUM \*\*  
JAMES R. HUDEK  
STANLEY E. CRAVEN

RONALD L. LANGSTAFF  
SANDRA L. SCHERMERHORN  
MICHAEL C. KIRK  
MICHAEL F. DELANEY  
I. EDWARD MARQUETTE  
CURTIS E. WOODS  
RUSSELL W. BAKER, JR.  
GARDINER B. DAVIS  
J. NICK BADGEROW \*\*  
DAVID O. GATCHELL  
TERRY W. SCHACKMANN \*\*  
PAUL D. COWING  
SCOTT J. GOLDSTEIN  
MARK P. JOHNSON  
JAMES T. PRICE  
GEORGANN H. EGLINSKI \*\*  
BRUCE E. CAVITT \*\*  
WILLIAM C. MARTUCCI  
RICHARD H. HERTEL \*  
JOHN L. UTZ  
MICHAEL F. SAUNDERS  
MARK A. THORNHILL

CHARLES S. SCHNIDER \*\*  
MITCHELL S. PETTIT \*  
CHARLES F. MYERS  
OF COUNSEL

1400 COMMERCE BANK BUILDING  
1000 WALNUT STREET  
KANSAS CITY, MISSOURI 64106-2140  
PHONE (816) 474-8100  
TELEX 43-4345  
FAX (816) 474-3216

KANSAS OFFICE  
SUITE 500, 40 CORPORATE WOODS  
9401 INDIAN CREEK PARKWAY  
P. O. BOX 25407  
OVERLAND PARK, KANSAS 66225-5407  
PHONE (913) 345-8100  
FAX (913) 345-0736

WASHINGTON, D. C. OFFICE  
1133 CONNECTICUT AVENUE, N.W.  
SUITE 1000  
WASHINGTON, D. C. 20036  
PHONE (202) 775-2376  
FAX (202) 833-8491

DAVID L. WING \*\*  
JAMES A. SNYDER  
SHIRLEY EDMONDS-GOZA  
DAVID A. SOSINSKI  
GREGORY C. LAWHON  
BRIAN H. DUNN  
BRIAN N. KAUFMAN  
MARTIN J. MODRGIN  
KENNETH A. MASON  
PARTHENIA B. EVANS \*\*  
TERESA A. WOODY  
ELAINE D. KOCH \*\*  
ANDREW W. STUMPF  
MICHAEL A. M. NICOLARSEN \*  
CINDY SESLER BALLARD  
STEPHANIE A. MATHEWS \*\*  
AMY L. PECK  
MICHAEL D. HOCKLEY  
JAMES H. ANDREASEN  
DOUGLAS J. EDMONDS \*\*  
EDWARD C. FENSHOLT \*  
MARY VIRGINIA CLARKE \*\*

\* ADMITTED IN KANSAS  
\*\* ADMITTED IN KANSAS AND MISSOURI  
ALL OTHERS ADMITTED IN MISSOURI

PLEASE REPLY TO THE MISSOURI OFFICE  
FILE NO.

WRITER'S DIRECT DIAL NUMBER IS:

February 28, 1990

## Hand Delivery

Ms. Ruth Mancos  
Emergency Support Section  
U.S. Environmental Protection Agency, 5HS-11  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Request for Information Pursuant to Section 104(e) of  
CERCLA and Section 3007 of RCRA, for the Conservation  
Chemical Company of Illinois Site in Gary, Indiana

Dear Ms. Mancos:

We are attorneys for American Telephone and Telegraph  
Company ("AT&T"), successor in interest to Western Electric  
Company, Incorporated ("Western Electric"). (See paragraph III.  
8 below.)

The Environmental Protection Agency ("EPA") sent two  
identical letters dated January 30, 1990 addressed to Western  
Electric requesting information regarding Western Electric's  
dealings with the Conservation Chemical Company of Illinois site  
in Gary, Indiana. One letter was sent to a Western Electric  
address in Richmond, Virginia ("the Richmond facility"). The  
other letter was sent to a Western Electric address in Winston-  
Salem, North Carolina ("the Winston-Salem facility"). This  
letter responds to both those letters. The affidavit of Judy  
McCarthy is attached hereto as Attachment I.

I. Limitations on Scope of Inquiry and Response. On  
February 15, 1990 the undersigned discussed with Ms. Mary  
Fulghum, EPA legal counsel, the scope of the requests for  
information. Ms. Fulghum agreed to the following interpretations  
of and limitations on the requests:

Page 2

A. The information requested by the January 30, 1990 letters is limited to Western Electric's dealings with the Gary, Indiana facility ("the CCCI Site" or "the site") of Conservation Chemical Company of Illinois ("CCCI") except as noted in subparagraph B(ii) below.

B. Although the information requests principally seek information about possible transportation of PCB oils to the CCCI Site, the requests cover all "hazardous substances." Ms. Fulghum, while acknowledging the primary emphasis of EPA's current inquiry to be PCBs, confirmed EPA's intention to request information at this time regarding any "hazardous substances" which might have been transported to the CCCI Site. Ms. Fulghum agreed that a company-wide search for all information regarding use, purchase, storage, treatment, disposal, transportation or other handling of any hazardous substances or materials during the period 1970 to 1985 is beyond the intended scope of the information requests. Ms. Fulghum and the undersigned, therefore, agreed to the following interpretation and modification of the information requests:

(i) Facility Addressed. Each facility addressed is required to respond only with respect to its own operations, and is not responsible for responding on behalf of any other Western Electric or AT&T facility. (Because the Winston-Salem facility merely served as the central billing facility for the Greensboro Shops, the Winston-Salem facility responds only with respect to the Greensboro Shops. See paragraph 7 below.)

(ii) PCBs. Each facility will provide information regarding its use, purchase, storage, treatment, disposal, transportation or other handling of PCBs, without regard to whether the PCBs were transported to the CCCI site.

(iii) Other Hazardous Substances or Materials. With respect to all hazardous substances or materials other than PCBs, each facility addressed may limit its response to its use, purchase, storage, treatment, disposal, transportation or handling of hazardous substances or materials which may have been transported to the CCCI Site.

C. Time for Response. Ms. Fulghum and the undersigned agreed that, with respect to the PCB information referred to in subparagraph B(ii) above, each facility

Page 3

addressed will respond within 25 days of its receipt of EPA's letter. With respect to information referenced in subparagraph B(iii) above, however, each facility shall have a 15-day extension of time to respond.

D. Financial Responsibility. Ms. Fulghum agreed that, until further notice from EPA, each facility addressed may respond to the requests for information regarding financial responsibility (requests number 8 through 12) by providing a copy of AT&T's most recent annual report to shareholders.

II. Objections to Instructions. AT&T objects to the instructions which accompany the information requests to the extent that they purport to require AT&T to provide documents or information in the possession, custody or control of former employees, agents, servants, contractors or employees.

AT&T went through the largest corporate reorganization in American history commencing in 1982. The reorganization included the divestiture of 22 former wholly-owned subsidiaries, and the reorganization of Western Electric Company, Incorporated's operations and its name change to AT&T Technologies, Inc. AT&T searched records it considered likely to contain information relating to the EPA's request, and similarly has interviewed those employees it considered likely to provide such information, but cannot categorically state that it has not inadvertently overlooked some piece of information that the EPA might consider responsive to its request or that might cause AT&T to supplement, modify or correct the answers to this request. Accordingly, AT&T reserves the right to supplement, modify or correct the responses provided below. Documents that are subject to lawyer/client communications privilege, attorney work product immunity or otherwise privileged or protected have not been produced.

III. Response to Requests. The Richmond facility and the Winston-Salem facility (Greensboro Shops) each respond to the information request received by it as follows:

1. Persons Consulted. The persons consulted in preparation of the answers to the information requests were:

For the Richmond Facility:

Robert Owens  
Senior Engineer  
AT&T Richmond Works  
4500 South Laburnum Avenue  
Richmond, Virginia 23231

Page 4

Doug Snapp  
Electrical Engineer  
AT&T Richmond Works  
4500 South Laburnum Avenue  
Richmond, Virginia 23231

Mike Thompson  
Industrial Hygienist  
AT&T Richmond Works  
4500 South Laburnum Avenue  
Richmond, Virginia 23231

For the Winston-Salem Facility (Greensboro Shops):

Robert Owens  
Senior Engineer  
AT&T Richmond Works  
4500 South Laburnum Avenue  
Richmond, Virginia 23231

Henry Campbell  
Senior Plant Engineer  
AT&T North Carolina Works  
3300 Lexington Road, S.E.  
Winston-Salem, North Carolina 27104

Frank Worden  
Environmental Health Consultant  
AT&T North Carolina Works  
3300 Lexington Road, S.E.  
Winston-Salem, North Carolina 27104

John Hart  
Electrical Engineer for  
Western Electric (retired)  
Last known business address:  
Greensboro Shops,  
Greensboro, North Carolina

2. Documents. Documents which form the basis for each facility's response are as follows:

For the Richmond Facility (Copies attached as Exhibit A):

1977 log sheets of waste removal rendered to the Richmond facility by Rollins Environmental Services, Inc. pursuant to purchase order RVX-447208 (3 pages).

Page 5

For the Winston-Salem Facility (Greensboro Shops):  
(Copy attached as Exhibit B)

Affidavit of Robert J. Flanagan dated November 9, 1984 in the litigation entitled USA v. Conservation Chemical Comany, et al. Case No. 82-0983-CV-W-5 in the United States District Court for the Western District of Missouri.

3. Other Persons. We know of no AT&T employees, contractors or agents who may be able to provide a more detailed or complete response than contained herein. Mr. Norman Hjersted, the owner and principal officer of CCCI, may be able to provide you additional information. We have not been in contact with Mr. Hjersted and do not know his current address.

4. EPA Identification Numbers. The EPA identification numbers for each facility addressed are as follows:

Richmond Facility, VAD066000993  
Winston-Salem Facility, NCD003213907  
Greensboro Shops, None (No EPA identification number was assigned because the shops closed before RCRA regulations requiring such identification numbers were enacted.)

5. Acts or omissions of other persons. AT&T objects to the broad, vague scope of this request, which does not identify the release or threat of release to which it refers, the facility or site to which it refers, the hazardous substance to which it refers, or even the company to which it refers. With respect to PCBs, AT&T has no indication that either facility addressed sent PCBs to the CCCI Site. AT&T makes no response to this inquiry to the extent it may be construed to require AT&T to identify acts or omissions of third parties. AT&T is aware that a large body of evidence has been accumulated by EPA with respect to CCCI's operation of the site. AT&T refers EPA to its own files for this information.

6. Persons Having Knowledge. AT&T objects to the overbroad scope of this request. Persons identified in paragraph III.1 above have knowledge or information about the generation, transportation, treatment, disposal or handling of PCBs. It is not possible, however, for AT&T to identify "all persons" having such knowledge.

Page 6

7. PCB Handling:. Except as set forth below and in the attached documents, neither facility used, purchased, stored, treated, disposed, transported or otherwise handled PCBs during the period 1970 to 1985:

Richmond facility. On August 8, 1977 the Richmond facility disposed of one 5-gallon container of suspected PCBs from an electrical transformer. This container was transported and disposed by Rollins Environmental Services, Inc. of Bridgeport, New Jersey. Copies of the log sheets showing removal of this container are attached as Exhibit A. The relevant transaction is logged on page 2 at line 12.

Winston-Salem facility (Greensboro Shops). The Winston-Salem facility never had any dealings with CCCI or its sister company, Conservation Chemical Company, except to serve as a billing center on behalf of the Greensboro Shops. (See Affidavit of Robert Flanagan, copy attached as Exhibit B.) Accordingly, AT&T's response to EPA's letter addressed to the Winston-Salem facility is limited to the operations of the Greensboro Shops, Greensboro, North Carolina.

The Greensboro Shops closed in 1976. We have found no documents indicating the Greensboro Shops used, purchased, stored, treated, disposed, transported or otherwise handled PCBs during the period 1970 to 1985. We talked to former Greensboro Shops employees Robert Owens, now at the Richmond facility, and John Hart, retired electrical engineer. They had no information to indicate that the Greensboro Shops used, purchased, stored, treated, disposed, transported or otherwise handled PCBs during the period 1970 to 1985.

8-12. Financial Responsibility. Western Electric Company, Incorporated, a wholly owned subsidiary of AT&T, changed its name on January 3, 1984 to AT&T Technologies, Inc. Effective December 31, 1989, AT&T Technologies, Inc. (formerly Western Electric) was merged into its parent, AT&T. As part of that merger, AT&T assumed Western Electric's liability, if any, for cleanup of hazardous substances which may have been disposed of at the CCCI Site.

Per agreement with Ms. Mary Fulghum described in paragraph I.D above, AT&T's most recent annual report to

SPENCER FANE BRITT & BROWNE

Page 7

shareholders is attached hereto as Exhibit C in response to requests 8 through 12.

Very truly yours,

A handwritten signature in dark ink, appearing to be "Spencer Fane Britt & Browne", with a long horizontal flourish extending to the right.

CHH:nrl

cc: Ms. Mary Fulghum (w/enclosures)

AFFIDAVIT

Judy McCarthy, being first duly sworn, on information and belief, states as follows:

My name is Judy McCarthy. I am an environmental engineer for American Telephone and Telegraph Company ("AT&T"). This affidavit refers to, and incorporates by reference, the February 28, 1990 letter from Carl H. Helmstetter to Ruth Mancos in response to EPA's request for information regarding the Conservation Chemical Company of Illinois site in Gary, Indiana.

I have been told that record searches were conducted at AT&T's Richmond Facility and AT&T's Winston-Salem Facility for documents relating to use, purchase, storage, treatment, disposal, transportation or other handling of PCBs during the period 1970 to 1985 by the Richmond Facility and the Greensboro Shops. I have been told that present employees who were considered likely to be able to provide the requested information were contacted.

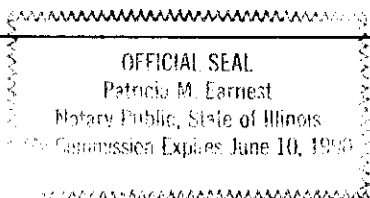
Judy McCarthy  
Judy McCarthy

STATE OF ILLINOIS            )  
COUNTY OF Cook            ) ss.

Subscribed and sworn to before me, a Notary Public in and for said County and State this 28 day of Feb., 1990.

Patricia M. Earnest  
Notary Public

My commission Expires:





L-2652 ELECTRONICS  
L-2123 SOLVING  
L-4165 ADDITIVE

Rollins 1977 ~~5500~~ C.O. 135-550 RYX-447208 PAGE 1

Received/Issued	Type	SALES	BL#	Tax	\$	Cum. \$	\$ BY MONTHLY
1/1/77	2122	- 4000	27958	19057	1135.00	1135.00	
2/1/77	2122	- 4000	27929	19055	1136.75	3343.75	
3/1/77	2122	CO. TRANS.	27924	19054	(90.)	3153.75	
4/1/77	2122	- 3500	27920	19053	1900.00	4053.75	
5/1/77	2122	CO. TRANS.	27914	19052	(45.)	4008.75	
6/1/77	2122	- 3500	28047	19121	1953.50	5941.25	
7/1/77	2122	- 4000	28103	19177	1219.52	7060.82	
8/1/77	2122	- 4000	28104	19178	1228.33	8289.16	
9/1/77	2122	- 4000	28134	19198	1090.00	9379.16	
10/1/77	2122	- 4000	28149	19213	1055.00	10434.16	10434.16
11/1/77	2122	- 4000	28172	19229	1059.38	11493.54	11493.54
12/1/77	2122	- 3500	28182	19256	979.28	12472.82	12472.82
1/1/78	2122	- 3500	28176	19219	1810.00	14282.82	
2/1/78	2122	- 4000	28292	19350	1146.88	15429.80	
3/1/78	2122	- 4000	28315	19351	1076.00	16505.80	
4/1/78	2122	- 3500	28314	19349	1852.50	18358.30	
5/1/78	2122	- 4000	28332	19369	1055.00	19413.30	
6/1/78	2122	- 4000	28417	19541	1055.00	20468.30	20468.30
7/1/78	2122	- 3800	28553	19563	1036.13	21484.43	21484.43
8/1/78	2122	- 3500	28584	19591	1817.50	23301.93	23301.93
9/1/78	2122	- 3800	28690	19658	1036.13	24338.06	
10/1/78	2122	- 3800	28710	19680	1029.25	25367.31	
11/1/78	2122	- 3500	28774	19723	1955.00	27322.31	
12/1/78	2122	- 3800	28852	19781	1098.00	28420.31	
1/1/79	2122	- 3500	28910	19810	1802.50	30222.81	30222.81
2/1/79	2122	- 4000	29196	19995	1088.13	31290.94	31290.94
3/1/79	2122	- 3500	29230	20008	1802.50	33093.44	33093.44
4/1/79	2122	4000	29536				4-1123=36322
5/1/79	2122	4000	29537	20230	2127.50	35220.94	35220.94
6/1/79	2122	3638	29666	20335	1871.32	37092.26	37092.26
7/1/79	2122	4000	29990	20579	1076.71	38168.97	
8/1/79	2122	3500	30017	20596	1802.50	39971.47	
9/1/79	2122	4500	30105	20658	1161.25	41132.72	
10/1/79	2122	4500	30135	20678	1139.38	42272.10	
11/1/79	2122	4500	30141	20698	1135.00	43407.10	43407.10
12/1/79	2122	4500	30141	20725	1739.80	45146.90	45146.90
1/1/80	2122	3320	30206	20776	1148.13	46295.03	46295.03
2/1/80	2122	4500	30216				4-1123=68203

L-4635 Diluted Soldering Plating Solution

PAGE 2

Receipt No.	Date	Type	Chase	Blk	Year	\$	Chase \$	\$ by MONTHLY
1	6/2/77	2123	3520	30373	20871	1810.00	45845.03	20871
2	6/10/77	2122	41200	30374	20872	10835.25	49200.78	20872
3	6/24/77	2123	3900	30355	21181	17321.00	50932.78	21181
4	6/29/77	2122	4000	30825	21229	2118.75	53057.53	21229
5	6/29/77	2122	4000	30826	21229		53057.53	21229
6	7/7/77	2122	4500	30918	21317	11423.73	54195.28	21317
7	7/13/77	2122	4000	31012	21412	10523.38	55254.63	21412
8	7/21/77	2122	4500	31121	21477	1156.88	56411.51	21477
9	8/4/77	2122	4500	31336	21622	1135.00	57546.51	21622
10	8/11/77	2122	4500	31473	21739	2278.75	59825.26	21739
11	8/11/77	2122	4500	31474				
12	8/18/77 (P.B.)	4531	1150	3070770	21670	10.00	59925.26	21670
13	8/10/77	2123	710	31447	21697	718.00	60643.26	21697
14	8/15/77	2122	4500	31530	21748	1139.38	61782.64	21748
15	9/1/77	2123	3500	31821	21786	1717.63	63487.77	21786
16	9/6/77	2122	4500	31878	22017	1149.75	64633.52	22017
17	9/13/77	2123	3500	31942	22125	1840.00	66473.52	22125
18	9/13/77	2122	4500	32022	22119	1143.75	67617.27	22119
19	9/23/77	2122	4500	32145	22257	1148.13	68765.40	22257
20	10/1/77	2123	4500	32199	22388	2577.53	71282.93	22388
21	10/1/77	2123	4500	32300	22387	2449.69	73732.62	22387
22	10/14/77	2123	4500	32351	22420	2320.15	76053.77	22420
23	10/15/77	2123	4500	32373	22427	2265.82	78318.59	22427
24	10/15/77	2122	4500	32374	22426	1150.00	79468.59	22426
25	10/16/77	2123	4500	32376	22452	2227.74	81746.33	22452
26	10/16/77	2122	4500	32397	22454	1143.75	82890.08	22454
27	10/19/77	2123	4500	32425	22476	2442.10	85332.18	22476
28	10/19/77	2122	4500	32473	22735	1156.88	86498.06	22735
29	11/1/77	2122	4500	32786	22760	1143.75	87641.81	22760
30	11/3/77	2122	4500	32824	22788	1143.75	88785.56	22788
31	11/4/77	2123	3500	32845	22790	1792.75	90578.31	22790
32	11/5/77	2123	3500	32895	22848	1284.16	92362.31	22848
33	11/9/77	2122	4500	32914	22841	1143.75	93506.06	22841
34	11/10/77	2122	4500	32937	22872	1139.38	94645.44	22872
35	11/21/77	2123	3500	33103	22944	1784.38	96429.82	22944
36	11/23/77	2123	3500	33158	23042	1788.38	98218.20	23042
37	11/29/77	2123	3500	33218	23086	1148.13	99366.33	23086

GM-551 (12-35)

L-2682 Electrodes

L-4531 PCB

L-2123 Solvent

L-4635 Diluted Sulfuric Plating Solution

L-4165 Adhesive

Rollins 1977

8/35, ECL RIX-447208

PAGE

Period	Type	Envs.	Blk	Tax	\$	Cum. \$	\$ Pay MONTHLY
11/30/77	2682	4500	33232	23126	1143.75	109570.28	814.00
12/19/77	2682	4500	33411	23132	1395.00	101905.09	814.00
12/23/77	2123	3500	33429	045800	2798.22	104703.30	814.00
12/27/77	2682	4500	33444	23219	1161.25	105864.55	814.00
Total Yr. 1977					\$ 105864.55		

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,       )  
                                  )  
                  Plaintiff,       )  
                                  )  
          v.                        ) Civil No. 82-0983-CV-W-5  
CONSERVATION CHEMICAL COMPANY,)   
et al.,                            )  
                                  )  
                  Defendants/       )  
                  Third-Party    )  
                  Plaintiffs,    )  
                                  )  
          v.                        )  
                                  )  
AEROQUIP CORPORATION, et al., )   
                                  )  
                  Third-Party    )  
                  Defendants.      )

AFFIDAVIT OF ROBERT J. FLANAGAN

STATE OF NORTH CAROLINA    )  
                                  ) ss.  
COUNTY OF FORSYTH         )

I, Robert J. Flanagan, being first duly sworn under oath,  
depose as follows:

1. I am Accounting Manager for the AT&T Technologies, Inc.  
manufacturing facility at Winston-Salem, North Carolina.

2. My job responsibility includes overall supervisory re-  
sponsibility for accounting, payroll and payment of supplier  
invoices.

3. The Winston-Salem facility and the Greensboro, North  
Carolina shops were two separate manufacturing facilities which  
were part of the "North Carolina Works" until the Greensboro  
shops closed in 1976. Winston-Salem always served as the central  
billing location for the North Carolina Works as well as other  
facilities.

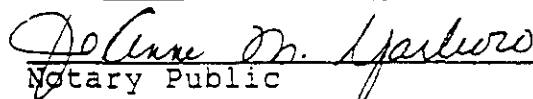
4. Under AT&T-TI's central billing procedure, purchases by Greensboro of goods and services were accounted and paid for by Winston-Salem. Invoices for services to be performed at Greensboro often showed Winston-Salem as the billing address.

5. The documents attached hereto as Exhibit A (documents W003537-8, W003922-3, and W003461-2) are invoices and related documents for waste disposal services which were performed for Greensboro, as indicated by the bills of lading, but were invoiced to Winston-Salem as the "billing address" because of Winston-Salem's central billing function.

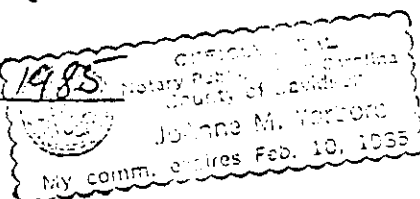
6. I have supervised a review of the applicable records at Winston-Salem and have not found any documents indicating that Winston-Salem ever contracted with Conservation Chemical Company or Conservation Chemical Company of Illinois for waste disposal services or any other services, or ever bought anything from either of those companies.

  
Robert J. Flanagan

Subscribed and sworn to before me, a Notary Public in and for said county and state, this 9th day of November, 1984.

  
Dolores M. Sparrow  
Notary Public

My commission expires:

February 10, 1985  




INVOICE

K 2239  
CONSERVATION CHEMICAL COMPANYPLEASE REMIT PAYMENT TO:  
CONSERVATION CHEMICAL CO.215 WEST PERSHING RD. SUITE 703  
KANSAS CITY, MO. 64108WESTERN ELECTRIC  
VOUCHER DEPT.  
3300 LEXINGTON AVE.  
WINSTON SALEM, N.C. 27102

RECEIVED

PHONE 219-949-8229

1974 DEC 9 AM 10 50

DATE NOVEMBER 29 1974

FINANCIAL DEPT

WESTERN ELECTRIC  
GREENSBORO, N.C.

ORDER NO.	DATE SHIPPED	SHIPPED VIA	TERMS	SALESMAN	OUR ORDER NO.
	11-27-74	OUR TRUCK	NET 30		

QTY.	DESCRIPTION	QTY. SHPD	UNIT PRICE	AMOUNT
	DISPOSAL OF AMMONIUM PERSULFATE B/L # 24026 WEIGHT 42600 LBS. ( 426.0 CWT )		@.82	\$ 349.32
	FREIGHT CHARGES 426.0 CWT		@1.44	\$ 613.44
				\$ 962.76

SUP. CODE	PUR. ORDER
P1129	166262
PUR. CODE	ACCTG CLASS
D9	282
MATL. NO.	DEV CODE
APPLY ON	COMM. CODE
	40-999
TERMS	N.C. YES NO
netc	TAX 2 F
PAY DATE	STOCK
12-20	
INV. DATE	DISC.
11-27	
INV. NO.	NET
2239	962.76
JOAN	LI. NO. C. NO. CL.
	24 6180

REASON FOR CANCELLATION	CLEANED
E	
INV. CLK.	CREDIT
	ED

302/1146

W003537

VERIFIED  
DEC 17 '74  
33

Seller represents that with respect to the production of the articles covered by this invoice, it has fully complied with the provisions of the Fair Labor Standards Act of 1938, as amended.

# **WRIGHT BILL OF LADING—SHORT FORM—Original—Not Negotiable**

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading,

BILL OF LADING NO.

24026



**CONSERVATION CHEMICAL COMPANY**

SHIPPER'S NO.

A property described below, is apparent good order, except as noted (contents and condition of packages unknown), marked, consigned, and delivered as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, it as at route, whenever to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party of any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading in form (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. (Mass or street address of consignee - for purposes of notification only.)

CARRIER'S NO.

TO: GREENSBORO, N.C. FROM WESTERN ELECTRIC

DATE: 11-27-24 NAME OF CARRIER: CCC

DESIGNED TO: CONSERVATION CHEMICAL COMPANY (Mail or street address of consignee for purposes of notification only.) 100 BREMAN AVENUE

DESTINATION: ST. LOUIS, MO. STATE: COUNTY:

NOTE: (To be filled in only when shipper desires and governing tariffs provide for delivery thereof.)

DELIVERING CARRIER: CONSERVATION CHEMICAL COMPANY CAR OR VEHICLE INITIALS & NO. P.O. NO.

NO. OF PACKAGES: DESCRIPTION: WEIGHT SUB TO CODE: CLASS OR RATE: CHECK COLUMN: (Signature of consignee.)

NO. OF PACKAGES	DESCRIPTION	WEIGHT SUB TO CODE	CLASS OR RATE	CHECK COLUMN
4,000	GALLONS AMMONIUM PERSULFATE			
42,600	NET WEIGHT			

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$100.

R. W. Pughon 11.27.24  
WESTERN ELECTRIC, Agent, Per

DEPART TERMINAL	ARRIVE TERMINAL	TOTAL TIME	ARRIVE PLANT	START LOAD	FINISH LOAD	DEPART PLANT	TOTAL TIME IN PLANT	HRS.	MIN.	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT	HOSE	PUMP	WEIGH	DEMURRAGE CHG.
										73,260	30,660	42,600				

DRIVER'S SIGNATURE

Ed Barker

REMARKS:

W003538

ORIGINAL

## INVOICE

K- 2339  
CONSERVATION CHEMICAL COMPANY

PLEASE REMIT PAYMENT TO:  
CONSERVATION CHEMICAL CO.  
215 WEST PERCHING RD. SUITE 703  
KANSAS CITY, MO. 64108

PHONE 219-949-8229

DATE JANUARY 21 19 75

WESTERN ELECTRIC  
VOUCHER DEPT.  
3300 LEXINGTON AVE.  
WINSTON SAEEM, N.C. 27102

WESTERN ELECTRIC  
GREENBORO, N.C.

BUYER'S ORDER NO.	DATE SHIPPED	SHIPPED VIA	TERMS	SALESMAN	OUR ORDER NO.
321E	SEE BELOW	OUR TRUCK	NET 30		
QTY. B.O.	DESCRIPTION	QTY. SHPD	UNIT PRICE	AMOUNT	
1-74-75	CHEMICAL DISPOSAL OF AMMONIUM PERSULFATE 4000 GALLONS 33,200 LBS (332.0 CWT ) FREIGHT CHARGES 33,200LBS (332.0 CWT ) B/L # 26840	332.0 332.0	@.82 @1.44	\$ 272. 24 \$ 478. 08	
				\$ 750. 32	

DISB. AUDIT  
FEB 19 '75  
12

VERIFIED

FEB 19 '75

133

W003922

302/1146

"Seller represents that with respect to the production of the articles covered by this invoice, it has fully complied with the provisions of the Fair Labor Standards Act of 1938, as amended."



STRAIGHT BILL OF LADING—SHORT FORM—Original—Not Negotiable

BILL OF LADING NO.

26840

SAVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.



CONSERVATION CHEMICAL COMPANY

SHIPPER'S NO.

CARRIER'S NO.

GREENSBORO, N.C. FROM WESTERN ELECTRIC

1-14 1925		NAME OF CARRIER		CCC
DESIGNED TO		(Mail or street address of consignee—for purposes of notification only.)		
CONSERVATION CHEMICAL COMPANY				
ORIGIN	STATE	COUNTY		
(To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)				
VERIFYING CARRIER		P.O. NO.		
CONSERVATION CHEMICAL COMPANY		CAR OR VEHICLE INITIALS & NO.		
		DA M- T2		
NO. OF PACKAGES	DESCRIPTION	WEIGHT SUB TO CAR	CLASS OR RATE	CHECK COLUMNS
4,000	GALLONS AMMONIUM PERSULFATE			
33,200	NET WEIGHT			
<p><i>R. L. Miller</i></p>		<p>(Signature of Consignor)</p>		

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not less than \$100.00.

CCC Shipper, Per J. MILLER

WESTERN ELECTRIC Agent, Per

DEPART TERMINAL	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT	HOSE	PUMP	WEIGH	DEMURRAGE CHG.
	62,100	28,900	33,200				
ARRIVE TERMINAL	MILES OUT	<p>DRIVER'S SIGNATURE <i>Ed Barker</i></p> <p>REMARKS:</p> <p>W003923</p>					
TOTAL TIME	MILES IN						
ARRIVE PLANT	DELAY AT TERMINAL						
START LOAD							
FINISH LOAD							
DEPART PLANT							
TOTAL TIME IN PLANT	HRS. MIN.						

ORIGINAL



INVOICE

# CONSERVATION CHEMICAL COMPANY

K 2650

REMIT TO:  
215 W. PERSHING BOULEVARD DEPT  
KANSAS CITY, MO. 64108 RD W-S NC

OPERATING PLANT:  
8900 FRONT STREET  
BOX 6304  
KANSAS CITY, MO. 64126  
816 483-4222

1975 AUG 1 AM 11 48 DATE JULY 29 19 75

WESTERN ELECTRIC  
VOUCHER DEPT.  
3300 LEXINGTON AVE.  
WINSTON, SALEM, N.C. 27102

CUSTOMER'S ORDER NO.	DATE PICKED UP	SHIPPED VIA	ACCOUNT	TERMS	CUSTOMER NO.	B/L NO.
NC 5321E	7-21-75	OUR TRUCK	302/1146 399/59096	NET 30		22867
QTY. SHIP'D.	QTY. S.G.	DESCRIPTION			UNIT PRICE	AMOUNT
		CHEMICAL DISPOSAL OF 4600 GALLONS AMMONIUM PERSULFATE 39,930 LBS ( 399.30 CWT ) @ 88¢ FREIGHT CHARGES 399.3 X 1.48			399.30 @88¢	\$351.38 590.96
						\$ 942.34

VERIFIED  
AUG 19 1975  
33

DISB. AUDIT  
AUG 19 1975  
17

W 003461

Seller represents that with respect to the production of the articles covered by this invoice, it has fully complied with the provisions of the Fair Labor Standards Act of 1938, as amended.

1. CUSTOMER 2. ADMINISTRATIVE OFFICE 3. CUSTOMER FILE

# RAIGHT BILL OF LADING—SHORT FORM—Original—Not Negotiable

BILL OF LADING NO.

22867

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.



CONSERVATION CHEMICAL COMPANY

SHIPPER'S NO.

CARRIER'S NO.

A properly described below, in apparent good order, except of liquid contents and condition of packages unknown, marked, consigned, and delivered as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of this property under the tariff) agreed to carry to its usual place of delivery or said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property, that each party or any time interested in all or any of said property, shall every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Motor Carrier Bill of Lading for form (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or motor carrier shipment, or (2) in the applicable motor carrier classification for tariff items is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, in form in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns, head or street address of consignee - for purposes of notification only.)

TO: GREENSBORO, N. C. FROM WESTERN ELECTRIC

7-21 1975

NAME OF CARRIER CCC

DESIGNED TO

(Mail or street address of consignee - for purposes of notification only.)

CONSERVATION CHEMICAL COMPANY

DESTINATION

STATE

COUNTY

8900 E. FRONT ST.

KANSAS CITY, MO.

ROUTE

(To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

P.O. NO.

LIVERING CARRIER

CAR OR VEHICLE INITIALS & NO.

CONSERVATION CHEMICAL COMPANY

226 #11 - T-11

NO. PACKAGES	DESCRIPTION	WEIGHT SUB TO CODE	CLASS OR RATE	CHECK COLUMN
	4,600 GALLONS <del>EXCESS</del> AMMONIUM PERSULFATE (CORROSIVE MATERIAL)			
BACK HAUL!				
EXEMPT FROM CERTIFICATION 177.819				
CORROSIVE PLACARDS APPLIED				

TE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be \$100.00.

CCC Shipper, Per J. MILLER

WESTERN ELECTRIC Agent, Per

DEPART TERMINAL	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT	HOSE	PUMP	WEIGH	DEMURRAGE CHG.
ARRIVE TERMINAL	68580	28650	39930				
TOTAL TIME	MILES OUT	MILES IN					
ARRIVE PLANT	1:45	DELAY AT TERMINAL					
START LOAD	2:00						
FINISH LOAD	3:00						
DEPART PLANT	3:10						
TOTAL TIME IN PLANT	HRS. MIN.						

DRIVER'S SIGNATURE

REMARKS:

W 003462

ORIGINAL

IF NOT DELIVERED IN FIVE DAYS RETURN TO

**SPENCER FANE BRITT & BROWNE**

1400 COMMERCE BANK BLDG.

1000 WALNUT ST.

KANSAS CITY, MO. 64106-2140

**First Class Mail**  
**First Class Mail**

Ms. Ruth Mancos  
Emergency Support Section  
U.S. Environmental Protection Agency, 5HS-11<sup>2</sup>  
230 South Dearborn Street  
Chicago, Illinois 60604